

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 18 CR 558
v.)	
)	Judge Robert M. Dow, Jr.
MILOT CADICHON)	

**DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION
TO TRAVEL OUTSIDE OF THE COUNTRY**

NOW COMES, the Defendant, MILOT CADICHON, by and through his attorney of record, TIMOTHY M. GRACE and MICHAEL LEVINSOHN, and brings this Motion for Permission to Travel Outside of the Country, and states the following:

1. Milot Cadichon pled guilty on December 16, 2019 to one count of Conspiracy to Defraud the United States.
2. The Court sentenced the defendant to 18 months to the custody of the United States Bureau of Prisons and 1 year of supervised release.
3. The defendant surrendered to the Bureau of Prisons on February 25, 2020 and served his sentence without incident.
4. The defendant was released from custody on August 18, 2020.
5. The defendant was placed on home confinement and monitored from the date of his release until June 4, 2021 and had excellent compliance with the conditions set.
6. The defendant began his supervised release on June 4, 2021 and has had excellent compliance with the conditions set by the Court including keeping in contact with his probation officer, refraining from any intoxicating substances, paying all fines and fees, not having any contact with law enforcement and being gainfully employed.

7. Since the the Defendant came off of home confinement he has been employed with Rapid Supply Transport which is a truck carrier based out of Fort Meyers, Florida. They serve all 48 states and Canada and transport freight for various customers.

8. The defendant has worked as an Account Manager and is a Distribution Supervisor. He has been given permission in the past to travel out of the jurisdiction to meet with clients regarding distribution accounts. He has complied with the conditions set.

9. As the Court recalls, Milot came to the United States from Haiti as a young child. He became a naturalized citizen and after graduating from high school enlisted in the United States Marine Corps. While enlisted in the Marine Corps, the defendant attained the rank of Corporal and served as a rifleman and squad leader. Among his awards were the National Defense Service Medal, Sea Service Ribbon, Good Conduct Medal and Armed Forces Expeditionary Medal. The defendant also received a Meritorious Mast, Certificate of Achievement, and a Sharpshooter Badge. From July 1995 through July 1996, the defendant was assigned to the Marine Corp Reserve. [He was on active reserve for 1 year of a total of 4 years of reserve] During his term of active duty, the defendant served in Haiti as part of Operation Restore Freedom. He also served outside of the United States in Japan (Okinawa) and Thailand. Within the United States he served at Ft. McCoy, Wisconsin; Camp Pendleton, California; and Ft. Bragg, and North Carolina., Additionally, the defendant served aboard the aircraft carriers USS Kitty Hawk and USS Independence. His discharge was under honorable conditions.

10. When he returned to Chicago, he worked odd jobs and was appointed to the Chicago Police Department on 13 October 1998. He got married in 1997 and had two

sons, Gary and David. David is afflicted with severe autism and is essentially nonverbal. While his first marriage ended in divorce, Milot is very close to both of his sons especially David. David lives with Milot's ex-wife, who he has a very good relationship with, and he sees David three to four times a week. In 2009 Milot remarried and has a very successful relationship with his current wife. Milot was able to purchase a home on the South side of Chicago where he supports and lives with his wife and his seventy-seven-year-old mother. His mother is in failing health having suffered from a heart attack and diabetes. Milot is very active in his church, Elgise Haitienne De La Grace and is very active in the Chicago Haitian Community.

11. In 2007, Milot took a leave of absence from the police department to be part of a U.S. State Department/UN (PAE a subsidiary of Lockheed Martin was the contractor) to help train the civilian police force in Haiti. Milot was part of an international effort to stabilize the government and suppress gang related violence. He came back to active duty at the Chicago Police Department one year later. Because of his service in Haiti he did not have the requisite 20 years of service with CPD prior to his termination in 2018 to receive a pension.

12. Since his release from custody, Milot has maintained his relationship with his wife and children and has been able to salvage his life and move on. He has shown all signs of rehabilitation and taken responsibility for the crime he committed.

13. Due to Milot's success at work he has been asked by Rapid Supply Transport to travel to the Dominican Republic for scheduled "face-to-face meeting with new potential clients . . . from April 23, 2022 to May 5, 2022." Ex A.

14. Milot is scheduled to be terminated from supervised release on June 4, 2022 approximately 45 days from the date of the filing of this motion.

15. The government and the probation department have indicated their respectful agencies do not oppose this request.

WHEREFORE, the Defendant, MILOT CADICHON, by and through his attorneys of record, TIMOTHY M. GRACE and MICHAEL LEVINSOHN, respectfully request that the defendant be allowed to travel to the Dominican Republic on the aforementioned dates.

Respectfully submitted,

s/ Michael J. Levisohn

s/Timothy M. Grace

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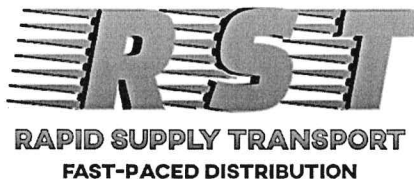
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UNOPPOSED ORDER TO TRAVEL
OUTSIDE OF THE UNITED STATES

It is HEREBY ORDERED that the Defendant, MILOT CADICHON, is permitted to travel to the Dominican Republic from the dates of April 23, 2022 up to and including May 5, 2022.

Robert M. Dow
United States District Judge

Dated



REQUEST TO TRAVEL

04 / 12 / 2022

Dear Mr. Milo Cadichon,

As we previously discussed, your job position requires you to travel from time to time and we have schedule several face-to-face meeting with new potential clients in Dominican Republic on April 23 through May 5, 2022 which is located at Isabel La Catolica No. 114 Ciudad Colonial de Santo Domingo, Republica Dominicans.

Please make all travel arrangements, provide us with your plane ticket and details arrival time so you can be pick up at the airport. Please make any arrangements necessary to prepare yourself to be available to travel. We will keep you updated and your lodging arrangements have been made at Hotel Riazor in the capital.

Best Regards,

A handwritten signature in cursive script that reads 'Yvon Plancher'.

Yvon Plancher

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